

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

United States of America,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action _____
	§	(CDCS: 2024A26921)
Jimmy Garces,	§	
	§	
Defendant.	§	

**Complaint**

1. *Jurisdiction.* The district court has jurisdiction because the United States is a party. *See U.S. CONST., art III, § 2, and 28 U.S.C. § 1345.*
2. *Venue.* The defendant resides in Cameron County, Texas, and may be served with process at 6580 Vista Jardin Circle, Brownsville, Texas 78521.
3. *The Debt.* The debt owed to the United States arose through a promissory note from the U.S. Small Business Administration which was lost, thus Plaintiff files with this complaint a Lost Instrument (“Note”) Affidavit, see Exhibit A. The debt on the date of the Certificate of Indebtedness, Exhibit B was:

A.	Current principal	\$ 7,244.51
B.	Interest (capitalized and accrued)	\$ 88.49
C.	Administrative fees, costs, penalties (Including \$405.00 Filing fee)	\$ 3,050.93
D.	Balance due	<u><u>\$ 10,383.93</u></u>
E.	Prejudgment interest accrues at 1.93% per annum being \$0.38 per day.	

- F. The current principal in paragraph 3 A is after credits of \$1,985.00.
4. *Default.* The United States has demanded that the defendant pay the indebtedness, and the defendant has failed to pay it.
5. *Prayer.* The United States prays for judgment for:
- A. The sums in paragraph 3, pre-judgment interest, administrative costs and post-judgment interest; and
  - B. Other relief the court deems proper.

Respectfully submitted,

CERSONSKY & MCANELLY, P.C.

By: /s/ M. H. Cersonsky

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